

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE)	
)	
ALEXANDER E. JONES)	CASE No. 22-33553
)	
DEBTOR.)	(CHAPTER 11)
)	
)	JUDGE CHRISTOPHER M. LOPEZ

**FIRST MONTHLY FEE STATEMENT OF BLACKBRIAR ADVISORS, LLC FOR
ALLOWANCE OF COMPENSATION FOR SERVICES RENDERED AS
FINANCIAL ADVISOR TO THE DEBTOR FOR THE PERIOD FROM
DECEMBER 2, 2022 THROUGH DECEMBER 31, 2022**

Name of Applicant:	BlackBriar Advisors, LLC	
Applicant's Role in Case:	Financial Advisor	
Date Order of Appointment Signed:	January 20, 2023 (Dkt #112)	
	Beginning of Period	End of Period
Time Period Covered in Statement:	12/02/2022	12/31/22
Summary of Total Fees and Expenses Requested		
Total Fees Requested in this Statement:	\$56,544.00 ¹ (80% of \$70,680.00)	
Total Reimbursable Expenses Requested in this Statement:	\$3,453.45 ²	
Summary of Fees for the Period Covered by this Statement		
Professional Fees in this Statement:	\$70,680.00	
Total Actual Professional Hours Covered by this Statement:	157.20	
Average Hourly Rate for Professionals:	\$449.62	
Summary Paraprofessional Fees for the Period Covered by this Statement		
Paraprofessional Fees Requested in this Statement:	\$0.00	
Total Actual Paraprofessional Hours Covered by this Statement:	0.00	
Average Hourly Rate for Paraprofessionals:	\$0.00	

¹ BlackBriar is holding \$200,000.00 as a retainer in its IOLTA Account which is included in this fee/expense request.

² The date listed for expenses contained in the attached does not necessarily reflect the date on which the expense was actually incurred by Applicant.

In accordance with the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Chapter 11 Professionals* [Docket No. #106], each party receiving notice of the monthly fee statement will have 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14 day period, the Debtor is authorized to pay the Professional an amount of 80% of the fees and 100% of the expenses requested in the applicable monthly fee statement.

Pursuant to §§ 327, 330, 331 of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the *Order Granting Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* (the “Interim Compensation Order”) [Docket No. 106], BlackBriar Advisors, LLC (“BlackBriar”), as Financial Advisor to the Debtor, hereby files its *First Monthly Fee Statement of BlackBriar Advisors, LLC. for Allowance of Compensation for Services Rendered as Financial Advisor to the Debtor for the Period from December 2, 2022 through December 31, 2022* (the “Monthly Fee Statement”).

RELIEF REQUESTED

1. By this Monthly Fee Statement, and pursuant to the Interim Compensation Order, BlackBriar seeks interim payment of \$56,544.00 (80% of 70,680.00) as compensation for professional services rendered to the Debtor during the period from December 2, 2022 through December 31, 2022 (the “Fee Period”); and reimbursement of actual and necessary expenses in the amount of \$3,453.45, for a total amount of \$59,997.45 to be paid upon expiration of the objection deadline barring any objections, pursuant to the Interim Compensation Order.

2. In support of the Monthly Fee Statement, BlackBriar submits a *Summary of Expenses for the Fee Period*, attached hereto as **Exhibit A**, a *Summary of Legal Fees by Category*

as Counsel for the Fee Period, attached as **Exhibit B**, and a *Detailed Record of Fees as Financial Advisor for the Fee Period*, attached hereto as **Exhibit C**.

3. Pursuant to the Interim Compensation Order, any party objecting to the payment of the compensation and reimbursement of expenses requested herein shall serve on the undersigned counsel and the following Retained Professionals (as defined in the Interim Compensation Order), and each of the other Notice Parties a written objection (the “Objection”) so that it is received on or before the Objection Deadline:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

In light of the nature of the relief requested herein, BlackBriar submits that no further or other notice is required.

4. Although every effort has been made to include all fees and expenses incurred in the Fee Period, some fees and expenses might not be included in this Monthly Fee Statement due to delays caused by accounting and processing during the Fee Period. BlackBriar reserves the right to make further application to this Court for allowance of such fees and expenses not included herein. Subsequent Monthly Fee Statements will be filed in accordance with the Bankruptcy Code, the Bankruptcy Rules, and the Interim Compensation Order.

5. Therefore, BlackBriar respectfully submits support for its fees in the amount of \$70,680.00 for reasonable, actual and necessary services rendered by it on behalf of the Debtor during the Fee Period and \$3,453.45 for reasonable, actual and necessary expenses incurred during the Fee Period. BlackBriar further submits that, pursuant to the Interim Compensation Order, and pending the expiration of the objection deadline, if no objections to the Fee Statement are received, that the Debtor shall be authorized to immediately pay to BlackBriar the amount of \$56,544.00³ which is equal to the sum of 80% of BlackBriar's fees and 100% of BlackBriar's expenses incurred during the Fee Period.

³ Such payment to be made first from any existing retainer funds held by BlackBriar for the Debtor.

Houston, TX

Dated: January 27, 2023

BLACKBRIAR ADVISORS, LLC

By: /s/ Bob Schleizer

Bob Schleizer

2626 Cole Ave., Suite 300

Dallas, TX 75201

Telephone: 214-599-8600

Email: bschleizer@blackbriaradvisors.com

**FINANCIAL ADVISORS FOR DEBTOR
ALEXANDER E. JONES**

CERTIFICATE OF SERVICE

I certify that on January 27, 2023, a true and correct copy of the foregoing pleading was served upon the parties listed on the attached service list via the Court's ECF system and pursuant to Local Rule 9003-1, via e mail or U.S. mail as follows:

- a. Co-Counsel to Debtor, Jordan & Ortiz, P.C., 500 North Shoreline Blvd., Suite 900, Corpus Christi, TX 78401 (Attn: Shelby Jordan, sjordan@jhwclaw.com)
- b. U.S. Trustee c/o Ha Minh Nguyen and Jayson ruff, Office of the United States Trustee 515 Rusk St, Ste 3516 Houston, TX 77002, ha.nguyen@usdoj.gov, jayson.b.ruff@usdoj.gov
- c. Proposed Counsel to the Official Committee of Unsecured Creditors, Akin Gump Strauss Hauer & Feld LLP, One Bryant Park, New York, NY 10036 (Attn: David M. Zensky, Marty L. Brimmage, Jr., Sara L. Brauner and Melanie A. Miller; dzensky@akingump.com, mbrimmage@akingump.com, sbrauner@akingump.com, melanie.miller@akingump.com
- d. Counsel to Connecticut Plaintiffs, (a) Koskoff Koskoff & Bieder PC, 350 Fairfield Avenue, Bridgeport, CT 06604 (Attn: Alinor Sterling, ASterling@koskoff.com) and (b) Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, NY 10019 (Attn: Kyle J. Kimpler and Martin Salvucci, kkimpler@paulweiss.com, msalvucci@paulweiss.com)
- e. Counsel to Texas Plaintiffs, (a) McDowell Hetherington LLP, 1001 Fannin Street, Suite 2700, Houston, TX 77002 (Attn: Avi Moshenberg, avi.moshenberg@mhllp.com) and (b) Chamberlain, Hrdlicka, White, Williams & Aughtry, PC, 1200 Smith Street, Suite 1400, Houston, TX 77002 (Attn: Jarrod B. Martin, Jarrod.Martin@chamberlainlaw.com)
- f. Any other parties that the Court may designate.

/s/ Christina W. Stephenson

Christina W. Stephenson

EXHIBIT “A”

SUMMARY OF EXPENSES FOR THE FEE PERIOD

EXPENSE	TOTAL
Airfare/Train	\$929.60
Mileage	28.19
Meals	46.79
Auto	529.73
Hotel	1,730.85
Other	188.29

EXHIBIT “B”**SUMMARY OF FEES AND EXPENSES BY CATEGORY
FOR THE FEE PERIOD**

<u>CATEGORIES</u>	<u>PROFESSIONAL TIME</u>	<u>PARAPROFESSIONAL TIME</u>
B110 Case Administration	38.50	0.00
B120 Asset Analysis and Recovery	64.10	0.00
B130 Asset Disposition	0.00	0.00
B140 Relief from Stay/Adequate Protection	0.00	0.00
B150 Meetings of & Communications with Creditors	2.0	0.00
B160 Fee/Employment Applications	1.30	0.00
B170 Fee/Employment Objections	0.00	0.00
B180 Avoidance Action Analysis	0.00	0.00
B185 Assumption/Rejection of Executory Contracts	0.00	0.00
B190 Other Contested Matters	0.00	0.00
B195 Non-Working Travel	0.00	0.00
B210 Business Operations	51.30	0.00
B220 Employee Benefits/Pensions	0.00	0.00
B230 Financing/Cash Collections	0.00	0.00
B240 Tax Issues	0.00	0.00
B250 Real Estate	0.00	
B260 Board of Directors Matters	0.00	
B310 Claims Administration and Objections	0.00	0.00
B320 Plan and Disclosure Statement	0.00	0.00
B410 General Bankruptcy Advice/Opinions	0.00	0.00
B420 Restructurings	0.00	0.00
TOTALS:	157.20	0.00

EXHIBIT “C”

DETAILED RECORD OF FEES FOR THE FEE PERIOD



BLACK BRIAR
ADVISORS LLC

January 27, 2023

Alex E. Jones
c/o Shelby A. Jordan
Jordan & Ortiz, P.C.
6207 Bee Cave Road, Suite 120
Austin, TX 78746

Re: **Alexander E. Jones, Debtor In Possession**

Case No. 22-33553

Billing Period: **December 1 through December 31, 2022**

Invoice No. **AJ1201-22**

Professional Services

Rendered:

<u>Date</u>	<u>Professional</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>	<u>Task Code</u>
12/5/2022	HK	Travel and meet with counsel enroute regarding case matters and scope	3.00	\$ 1,500.00	B110
12/5/2022	BS	Travel and meet with counsel enroute regarding case matters and scope	3.00	1,500.00	B110
		Kick off introductory individual meetings at Shelby Jordan's office -B. Schleizer, V. Driver, A. Gerard & H. Kessler; met with Shelby Jordan & David Jones (2.5); document accumulation and review for case(.9)			
12/5/2022	BS	Kick off introductory individual meetings at Shelby Jordan's office -B. Schleizer, V. Driver, A. Gerard & H. Kessler; met with Shelby Jordan & David Jones (2.5); prepare asset schedule from counsel records (2.2)	4.70	2,350.00	B110
12/5/2022	HK	Meetings at Shelby Jordan's office; B. Schleizer, V. Driver, A. Gerard & H. Kessler met with A. Jones (.7) & B. Roe - distribution and accounting analysis - FSS and PQPR(3.5);	3.40	1,700.00	B110
12/6/2022	HK	Asset schedule preparation(2.0); analysis of attorney documentation(1.0)	4.20	2,100.00	B120
12/6/2022	HK	Meetings at Shelby Jordan's office; B. Schleizer, V. Driver, A. Gerard & H. Kessler met with A. Jones (.7) & B. Roe - distribution and accounting analysis - FSS and PQPR(2.5); recap with counsel (1.0)	4.00	2,000.00	B120
12/6/2022	BS	Bank account recap and analysis (1.3); Documentation review; dropbox set up (2.4); recap with counsel (1.0)	4.20	2,100.00	B120
12/6/2022	BS		4.70	2,350.00	B120
12/6/2022	HK	B. Schleizer & H. Kessler met with M. Flores - PQPR accounting, ownership, distributrions	0.90	450.00	B210
12/6/2022	BS	B. Schleizer & H. Kessler met with M. Flores - PQPR accounting, ownership, distributrions	0.90	450.00	B210
12/7/2022	HK	B. Schleizer & H. Kessler met with S. Mansfield - personal expenses and banking	2.50	1,250.00	B210
		B. Schleizer & H. Kessler met with S. Mansfield - personal expenses and banking(2.5); move client documents to dropbox(1.6)			
12/7/2022	BS		4.10	2,050.00	B210
12/8/2022	HK	B. Schleizer & H. Kessler call with L. Muniz-Jones assistant; expenses admin for client	0.60	300.00	B210
12/8/2022	BS	B. Schleizer & H. Kessler call with L. Muniz-Jones assistant; expenses admin for client	0.60	300.00	B210
12/8/2022	HK	Review information sent to us by L. Muniz; review information sent by S. Mansfield;	1.60	800.00	B110
12/8/2022	HK	update call with V. Driver & B. Schleizer bankruptcy issues; case admin	0.50	250.00	B110
12/8/2022	BS	update call with V. Driver & B. Schleizer bankruptcy issues; case admin	0.50	250.00	B110
12/8/2022	BS	Call with David Jones - banking	0.40	200.00	B120
		Team Meeting call with V. Driver, P. McGill, R. Battaglia, B. Schleizer & H. Kessler re Free Speech issues			
12/9/2022	HK		0.80	400.00	B110
		Team Meeting call with V. Driver, P. McGill, R. Battaglia, B. Schleizer & H. Kessler re Free Speech issues			
12/9/2022	BS		0.80	400.00	B210
12/9/2022	HK	Document insurance coverage.	1.70	850.00	B210
12/12/2022	HK	Conference call Stephen Lemmon, V. Driver & B. Schleizer Re: information access David Jones	0.80	400.00	B120
12/12/2022	HK	Conference call Stephen Lemmon, V. Driver & B. Schleizer Re: information access David Jones	0.80	400.00	B120
12/13/2022	HK	Review S. Mansfield's emails, updated household expenses & insurance matters	2.30	1,150.00	B210
		Meetings with A. Jones; P. McGill, T. Enlow; call with M. Boyd of Axios Bank regarding DIP account; emails with S. Mansfield; viewed gun safes in office with T. Enlow			
12/14/2022	HK	On site Meeting with Alex and David Jones(3.5); obtain bank account info; extract current bank activity (4.5)	8.00	4,000.00	B120
12/14/2022	KN	On site Meeting with Alex and David Jones(2.5); call with Amex and A. Jones (.3); Document accumulation and set up for Initial debtor interview (2.1)	8.00	3,200.00	B120
12/14/2022	BS	Meeting with A. Jones at his house, viewed one gun safe/locker, Meeting with J. Dalessio & V. Driver	4.90	2,450.00	B210
12/15/2022	HK		3.00	1,500.00	B120
12/15/2022	KN	Download and sort bank transactions	6.00	2,400.00	B120
		Calls with B. Marchand & B. Schleizer DIP account requirements (.4); emails with S. Mansfield - insurance, expenses(.3); Reviewed Initial Report Checklist missing items(1.0)			
12/16/2022	HK		1.70	850.00	B210
12/16/2022	KN	Download and sort bank transactions (10 accounts)	4.00	1,600.00	B120
		Call with counsel - V. Driver - Initial Debtor Interview (.4); preparation for interview (.8); call with A. Jones re Initial Interview (.2)			
12/16/2022	BS		1.40	700.00	B110

Re: Alexander E. Jones, Debtor In Possession

Case No. 22-33553

Billing Period: December 1 through December 31, 2022
Invoice No. AJ1201-22

12/17/2022	HK	Team call - Initial Report Checklist for Debtor interview- information requirements/missing documentation	1.20	600.00	B110
12/17/2022	BS	Team call - Initial Report Checklist for Debtor interview- information requirements/missing documentation	1.20	600.00	B110
12/17/2022	KN	Team call - Initial Report Checklist for Debtor interview- information requirements/missing documentation	1.20	480.00	B110
12/17/2022	KN	Download bank statements and activity	6.80	2,720.00	B120
12/18/2022	HK	Review/finalize Initial Report Checklist; call with C. Stephenson	1.10	550.00	B110
12/18/2022	BS	Review/finalize Initial Report Checklist; call with C. Stephenson	0.50	250.00	B110
12/18/2022	KN	Download bank statements and activity	1.50	600.00	B110
12/19/2022	HK	Various calls updating insurance coverages(1.0); bank balances for Initial Report Checklist(.7); call with Dr. Jones(.4); call with Prosperity Bank regarding setting up DIP bank account(.3)	2.40	1,200.00	B210
12/19/2022	HK	Initial Debtor Interview(1.0)	1.00	500.00	B150
12/19/2022	BS	Initial Debtor Interview	1.00	500.00	B150
12/19/2022	KN	Download/analyze bank statements	3.50	1,400.00	B120
12/20/2022	HK	Calls/texts with Dr. Jones (bank contacts)re DIP account .6; calls with Chase Bank to set-up DIP Deposit account .5; call with K. Norderhaug & B. Schleizer to discuss revenue sources (.9); document review 1.8	3.80	1,900.00	B210
12/20/2022	HK	Team call - revenue analysis(.9)	0.90	450.00	B210
12/20/2022	KN	Download bank statements/analysis	5.00	2,000.00	B120
12/21/2022	HK	Call with C. Stephenson & V. Driver Re: bank accounts & utilities(.6); calls with PNC to set-up DIP Deposit account(.3); modeled forecast template(5.7)	6.60	3,300.00	B110
12/21/2022	BS	Email trustee re MOR(.1); follow up - Roe distribution analysis(.1); Excel MOR template (.6)	0.80	400.00	B110
12/22/2022	HK	Calls with PNC Re DIP Deposit account(.4); set-up master control request list from all parties to track information flow (3.1)	3.50	1,750.00	B210
12/22/2022	BS	FSS/PQPR Sales reconciliation; forward to team re: income for client	0.40	200.00	B210
12/23/2022	HK	Call with A. Jones, V. Driver & PNC Bank Re: DIP depository account; Call with V. Driver & R. Battaglia Re: Supplement sales reconciliation	0.70	350.00	B120
12/23/2022	BS	Review employment application.6; update master spreadsheet re document status(.7)	1.30	650.00	B160
12/28/2022	HK	Created excel trend analysis of settlement reconciliation(1.9); update calls with V. Driver, C. Stephenson & B. Schleizer(1.8)	3.70	1,850.00	B110
12/28/2022	BS	calls with counsel; key open issues and document needs	1.80	900.00	B110
12/29/2022	HK	Call with S. Mansfield, K. Norderhaug & B. Schleizer Re: upcoming bills & expenses(.8); worked on expense forecast(2.7)	3.50	1,750.00	B210
12/29/2022	BS	Team call re: cash balances and expenses	0.80	400.00	B210
12/29/2022	KN	Review actual expenses from bank activity and client schedules; set up QB; discussion w/ BS, HK, SM (.8)	7.00	2,800.00	B210
12/30/2022	KN	Set Up QB accounting	2.50	1,000.00	B210
12/31/2022	HK	Updated settlement reconciliation, emailed agenda out to participants for next weeks meeting at FSS	1.80	900.00	B210
12/31/2022	KN	Set Up QB accounting	3.70	1,480.00	B210
			151.20	\$ 70,680.00	

Total hours for Robert Schleizer (BS)	35.00	\$ 17,500.00
Total hours for Harold Kessler (HK)	67.00	33,500.00
Total hours for Kathy Norderhaug (KN)	49.20	19,680.00
	151.20	\$ 70,680.00

Expenses

From attached expense breakdown

\$ 3,453.45

Total Invoice Amount**\$ 74,133.45**

BlackBriar Advisors LLC
2626 Cole Ave., Suite 300
Dallas, TX 75204

Alex E. Jones

Billing Period:

December 1 through December 31, 2022

Invoice:

AJ1201-22

<u>Date</u>	<u>Airfare/Train</u>	<u>Mileage</u>	<u>Meals</u>	<u>Auto</u>	<u>Hotel</u>	<u>Other</u>	<u>Total</u>
1-Dec	-	-	-	-	-	-	-
2-Dec	-	-	-	-	-	-	-
3-Dec	-	-	-	-	-	-	-
4-Dec	-	-	-	-	-	-	-
5-Dec	-	-	-	-	-	19.98	19.98
6-Dec	224.00	-	-	-	-	114.31	338.31
7-Dec	-	-	-	-	-	-	-
8-Dec	-	-	-	-	-	-	-
9-Dec	-	-	-	-	-	-	-
10-Dec	-	-	-	-	-	-	-
11-Dec	-	-	-	-	-	-	-
12-Dec	-	-	-	-	-	-	-
13-Dec	576.60	14.09	46.79	514.29	1,085.93	24.00	2,261.70
14-Dec	-	-	-	-	-	-	-
15-Dec	129.00	14.10	-	15.44	644.92	30.00	833.46
16-Dec	-	-	-	-	-	-	-
17-Dec	-	-	-	-	-	-	-
18-Dec	-	-	-	-	-	-	-
19-Dec	-	-	-	-	-	-	-
20-Dec	-	-	-	-	-	-	-
21-Dec	-	-	-	-	-	-	-
22-Dec	-	-	-	-	-	-	-
23-Dec	-	-	-	-	-	-	-
24-Dec	-	-	-	-	-	-	-
25-Dec	-	-	-	-	-	-	-
26-Dec	-	-	-	-	-	-	-
27-Dec	-	-	-	-	-	-	-
28-Dec	-	-	-	-	-	-	-
29-Dec	-	-	-	-	-	-	-
30-Dec	-	-	-	-	-	-	-
31-Dec	-	-	-	-	-	-	-
Total	\$ 929.60	\$ 28.19	\$ 46.79	\$ 529.73	\$ 1,730.85	\$ 188.29	\$ 3,453.45